

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA : **TO BE FILED UNDER SEAL**  
v. : Dated: April 12, 2013  
RALPH CROZIER :

AFFIDAVIT

I, Dana Mofenson, having been duly sworn, do hereby state:

**I. INTRODUCTION**

1. I am a Special Agent with the Drug Enforcement Administration ("DEA") and have been so employed since August 2004. Since becoming a Special Agent, I have participated in numerous criminal investigations, including investigations into suspected narcotics trafficking. I am currently assigned to the DEA High Intensity Drug Trafficking Area (HIDTA) Task Force (hereinafter referred to as "Task Force"), which investigates those drug organizations believed to have the greatest adverse impact on the Bridgeport area. During my assignment to the Task Force, I have prepared and submitted numerous affidavits in support of applications for federal search warrants and arrest warrants, as well as in support of authorizations to conduct electronic surveillance.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal felony offenses. I am a participating member of the Task Force, which is comprised of personnel from the Drug Enforcement Administration, Connecticut State Police, Stratford Police Department, Stamford Police

Department, Bridgeport Police Department, Norwalk Police Department and Westport Police Department.

3. This affidavit is submitted in support of a criminal complaint for Ralph CROZIER, who was arrested without a warrant on April 11, 2011, for the charges identified herein. This affidavit is based on my personal knowledge and upon information provided to me by other law enforcement officers and agents. This affidavit is not intended to set forth all of the information that I and other law enforcement personnel have learned during this investigation. Rather, it sets forth only those facts which I believe are necessary and sufficient to establish that probable cause exists to charge CROZIER with conspiracy to launder monetary instruments, in violation of Title 18, United States Code, Section 1956(h), and an attempt to launder monetary instruments, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

## **II. PROBABLE CAUSE**

4. Between approximately May 2010, CROZIER represented an individual in relation to various criminal matters in Waterbury, Connecticut. On September 12, 2011, that individual was arrested for narcotics trafficking; soon thereafter, he began cooperating with law enforcement (hereinafter "CW-1").

5. During the course of his cooperation, CW-1 advised law enforcement that he had provided CROZIER with narcotics trafficking proceeds that CROZIER agreed to invest on CW-1's behalf. Specifically, when CW-1 advised CROZIER that he had a large quantity of U.S. currency that he earned from selling narcotics, CROZIER convinced CW-1 to invest \$30,000 in cash in a solar energy company. CROZIER told CW-1 that he (CROZIER) would deposit the money in \$9,000 increments into multiple accounts. CROZIER further stated that he would provide CW-1 with a note for the money, signed by the solar energy company's three owners. As

promised, after depositing CW-1's money, CROZIER provide CW-1 with a note that stated that the solar energy company would pay interest of 10 percent per annum in exchange for the \$30,000 and that the note could be converted to a 10% ownership interest in the solar energy company. The note was signed by CROZIER's law partner.

5. Based upon the information provided by CW-1, law enforcement arranged for a second cooperating witness (hereinafter "CW-2") to meet with CROZIER in relation to the narcotics trafficking proceeds that CW-1 deposited with CROZIER.

6. Specifically, on February 21, 2013, CW-2 met with CROZIER. During a recorded conversation between CROZIER and CW-2, the two discussed CW-1's recently imposed ten year prison sentence and then had the following exchange:

CROZIER: Does he, does he, does he still owe the feds?

CW-2: No they took everything.

CROZIER: No! My question is was there an order at the time of his sentencing for...

CW-2 Money? No.

CROZIER: For restitution?

CW-2 No. They took his Lincoln, they took cash, they...

CROZIER: Well they didn't take everything because I know he was hiding in (UI)  
(whispers)

CW-2: Well they took what he had that was in his name.

CROZIER: Well yeah, they didn't, they didn't know where his cash was.

CW-1: Right.

CROZIER: Cash was hidden and he told me where some of the places where the cash

was hidden.

7. CROZIER and CW-2 then again discussed CW-1's sentence:

CROZIER: Yeah there were no guidelines with Oxycontin, what did they use? Heroin?

CW-2: No I don't know, I mean I thought he said marijuana, but that seems really high for marijuana

CROZIER: It is very high for marijuana

CW-2: Is it?

CROZIER: UI

CW-2: Heroin, I would of thought they would have used heroin because people who do Oxys . . .

CROZIER: (Unitelligible) heroin

8. On April 11, 2013, CROZIER again met with CW-2. During their meeting, the following conversation took place:

CW-2: OK. Now I did talk to [CW-1]. Um, huh, okay, I told him that you know I did finally make it here and all that, good, and [CW-1] said, well I told [CW-1] what you told me you know, about hiding [CW-1's] money from, from shipments. So, [CW-1] said ok. And [CW-1's] so paranoid . . .

CROZIER: Hiding his, hiding his money from . . .

CW-2: . . .the shipments. When he's doing his thing,

CROZIER: Right.

CW-2: OK, so [CW-1's] so paranoid, it's unbelievable. But anyway, [CW-1] kind of eventually told me where one of it was.

CROZIER: OK.

CW-2: So [CW-1] asked me to try to get it to you to give to, to so that when [CW-1] gets out, he'll have money . . .

CROZIER: OK, what are we talking about?

CW-2: This one [CW-1] gave – the one I just found out about was like about 11,000, which I have.

CROZIER: OK, OK.

CW-2: And [CW-1's] got another one [CW-1] said said about thirty

CROZIER: Ok.

CW-2: So . . .

CROZIER: [CW-1] should have a few more than that.

CW-2: Well, that's what [CW-1] told me. I guess [CW-1] took some before. Because [CW-1] had stopped, you know, [CW-1] had stopped doing that

CROZIER: [CW-1] had stopped for a while but [CW-1] should have a lot more than that.

CW-2: So, well that's all [CW-1's] telling me about and it took me forever to figure out where to find this one you know?

CROZIER: Because it was hidden.

CW-2: Yeah.

CROZIER: And you have it with you?

9. CROZIER then took the money from CW-2 and told CW-2 that he would give CW-2 a receipt. CROZIER further advised CW-2, "then I got to deposit." CROZIER continued, "I will not only going to help [CW-1], but I'm going to make out this receipt to [CW-1]." CROZIER told CW-2, "I don't want to put your name on anything" (CI-2 states "okay") "because I don't want you involved with hiding things from the Feds."



### III. CONCLUSION

10. On the basis of the foregoing, there is probable cause to believe, and I do believe, that from approximately May 2011 to approximately September 13, 2011, CROZIER conspired to launder monetary instruments, in violation of Title 18, United States Code, Sections 1956(h). Additionally, on or about April 11, 2013, CROZIER attempted to launder monetary instruments, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

11. Finally, because this affidavit relates to an ongoing investigation, I believe that public disclosure of this affidavit and public disclosure of the existence of the complaint for the above-named defendant may tend to: compromise the investigation and compromise the safety of cooperating witnesses whose identity might be discernable by those knowledgeable of the facts contained in the complaint. Accordingly, your affiant respectfully requests that the Court direct the Clerk of the Court to seal the complaint and docketing of the complaint and further Order that the sealed complaint shall remain with the United States Attorney's Office for the District of Connecticut until further Order of a Court in the District of Connecticut.



DANA MOFENSON  
SPECIAL AGENT, DEA

Subscribed and Sworn to before me  
this 12<sup>th</sup> day of April, 2013.



THE HON. WILLIAM I. GARFINKEL  
UNITED STATES MAGISTRATE JUDGE